FILED
DEC 22 2016
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Cause No.
	)	4:16CR554 RLW/PLC
ANTHONY HENDERSON,	)	
and	)	
CHELCI LILLARD,	)	
	)	
Defendants.	)	
	)	

INDICTMENT

COUNT I
(Possession of Stolen Security)

The Grand Jury charges that:

Between on or about December 6, 2016 and on or about December 12, 2016, within the Eastern District of Missouri,

ANTHONY HENDERSON
and
CHELCI LILLARD

the defendants herein, did possess certain stolen securities, that is, check number 159822 in the amount of $7,773.54 written by Imperial Woodworking Company from its account with Cornerstone National Bank & Trust Company in Palatine, Illinois and made payable to Sunbelt Rentals, that was of a value of $5,000 or more which security had crossed a State boundary after being stolen, to wit, said security being stolen between December 6, 2016 and December 12, 2016, in the State of Illinois and subsequently brought into the State of Missouri, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2315 and 2.

COUNT II
(Interstate Transportation of Altered Security)

The Grand Jury further charges that:

Between on or about December 6, 2016 and on or about December 12, 2016, within the Eastern District of Missouri,

ANTHONY HENDERSON
and
CHELCI LILLARD

the defendants herein, with unlawful and fraudulent intent, did transport and cause to be transported in interstate commerce from the State of Illinois to the State of Missouri, an altered security, that is, check number 159823 in the amount of $7,391.05 written by Imperial Woodworking Company from its account with Cornerstone National Bank & Trust Company in Palatine, Illinois and made payable to Sunbelt Rentals, knowing the same to have been altered.

In violation of Title 18, United States Code, Sections 2314 and 2.

COUNT III
(Possession of Stolen Mail)

The Grand Jury further charges that:

On or about December 12, 2016, within the Eastern District of Missouri,

ANTHONY HENDERSON
and
CHELCI LILLARD

the defendants herein, did unlawfully have in their possession a letter addressed to Ferrellgas at 1600 Midrivers Ind. Dr., St. Peters, MO 63376, which had been stolen, taken, embezzled and abstracted from a mail receptacle, which was an authorized depository for mail matter, knowing the said letter to have been stolen, taken, embezzled and abstracted from an authorized depository for mail matter.

In violation of Title 18, United States Code, Sections 1708 and 2.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 981 (a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Sections 1708, 2314 or 2315, as set forth in this indictment, the defendants, **ANTHONY HENDERSON AND CHELCI LILLARD**, shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to such violation(s).

2. Subject to forfeiture is a sum of money equal to the value of the property, real or personal, constituting or derived from proceeds traceable to such violation(s).

3. Specific property subject to forfeiture includes, but is not limited to, the following:

a. Brother brand Electronic Typewriter;

b. HP brand Printer;

c. Blank check stock;

d. Hewlett-Packard brand laptop computer;

e. Samsung brand tablet;

f. LG brand cellular phone;

g. iphone brand cellular phone; and

h. various business and personal checks.

4. If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dated: ______________________

A TRUE BILL

____
FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

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GILBERT C. SISON
Assistant United States Attorney